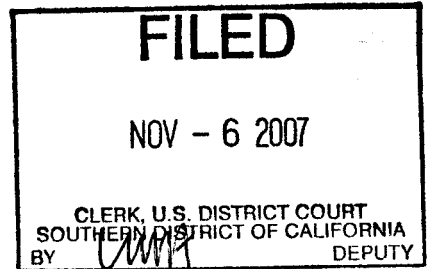


ORIGINAL



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Criminal Case No. **07 CR 2913 - L**
)
Plaintiff,) I N F O R M A T I O N
)
v.)
)
JOHN KELLER NORRIS, (1)) Title 18, U.S.C., Sec. 1832(a)(5)
14 MATTHEW KNOX NORRIS, (2)) - Conspiracy to Steal Trade Secrets
)
15 Defendants.)
)
16 _____)

The United States Attorney charges:

Count 1

Beginning on or about March 23, 2007, and continuing to on or about April 8, 2007, within the Southern District of California, defendants JOHN KELLER NORRIS (1) and MATTHEW KNOX NORRIS (2) with intent to convert a trade secret, to wit: confidential bidding information submitted by The Imperial Group to the United States General Services Administration regarding a proposal to build a facility for the United States Department of Homeland Security, Immigration and Customs Enforcement, in El Centro, California, a facility in interstate and foreign commerce; to the economic benefit

1 of J.K. Norris & Company, and knowing that the offense would injure
2 The Imperial Group and the United States General Services
3 Administration, knowingly conspired with each other to steal and to
4 obtain by artifice such information without authority, in violation
5 of Title 18, United States Code, Section 1832(a)(1).

6 OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

7 In furtherance of this conspiracy, the defendants committed the
8 following overt acts within the Southern District of California:

- 9 1. On or about March 23, 2007, defendant JOHN KELLER NORRIS
10 obtained a master key from the janitorial closet of 7825
11 Fay Avenue, La Jolla, California, and confirmed that it
12 operated the lock on the door of The Imperial Group, a
13 tenant in that building.
- 14 2. On or about April 8, 2007, defendant JOHN KELLER NORRIS
15 obtained a master key from the janitorial closet of 7825
16 Fay Avenue, La Jolla, California, and used the key to
17 illegally enter the offices of The Imperial Group.
- 18 3. On or about April 8, 2007, defendant JOHN KELLER NORRIS
19 searched the offices of The Imperial Group for the "bid
20 book" pertaining to the bid of The Imperial Group to build
21 a facility for the United States Department of Homeland
22 Security, Immigration and Customs Enforcement, in El
23 Centro, California, as to which J.K. Norris & Company, a
24 business owned by defendant JOHN KELLER NORRIS and which
25 also employed defendant MATTHEW KNOX NORRIS, also had
26 submitted a bid.
- 27 4. On or about April 8, 2007, defendant JOHN KELLER NORRIS,
28

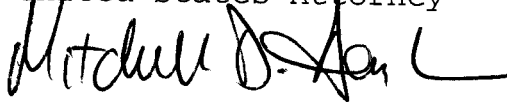
1 having failed to locate the "bid book," stole a
2 confidential blueprint of the design of the building
3 submitted by The Imperial Group to the United States
4 General Services Administration in support of its bid.

5 5. On or about April 8, 2007, defendant MATTHEW KNOX NORRIS
6 stood outside 7825 Fay Avenue, La Jolla, California,
7 remained in cellular contact with defendant JOHN KELLER
8 NORRIS and served as a "lookout" while defendant JOHN
9 KELLER NORRIS illegally entered and searched the offices of
10 The Imperial Group.

11 All in violation of Title 18, United States Code, Section 1832(a)(5).

12 DATED: October 18, 2007

13
14 KAREN P. HEWITT
United States Attorney

15 
16 MITCHELL D. DEMBIN
17 Assistant U.S. Attorney